

Mr. Mike Talaga  
GDx Automotive  
One General Street  
Wabash, Indiana 46992

Re: 169-14411-00004  
Second Minor Source Modification to  
Pending Part 70 No.: TV169-5650-00004

Dear Mr. Talaga:

GDx Automotive applied for a Part 70 operating permit on April 1, 1996 for a stationary source that manufactures various extruded rubber vehicle sealing products. An application to modify the source was received on May 24, 2001. Pursuant to 326 IAC 2-7-10.5 the following emissions units are approved for construction at the source:

- (a) One (1) rubber extrusion, identified as line # 4 consisting of the following:
  - (1) Two (2) extruders, with a combined maximum capacity of 1000 pounds of rubber per hour;
  - (2) One (1) electric molten salt curing oven exhausting to five (5) stacks (L4-1, L4-2, L4-3, L4-4 and L4-5;
- (b) One (1) high volume low pressure (HVLP) surface coating booth, identified as Honda Coating Booth, coating rubber parts at a maximum rate of 94 parts per hour, with particulate emissions controlled by a dry filter system and emissions exhausted through stack H-1;
- (c) One (1) electric IR drying oven, identified as Honda IR oven, with emissions exhausted through stack H-2; and
- (d) Change of identification on the existing permitted Line #3 topcoat spray booth into Line #4 spray booth exhausting to stack L4-6.

The proposed Minor Source Modification approval will be incorporated into the pending Part 70 permit pursuant to 326 IAC 2-7-10.5(l)(3). The source may begin operation upon issuance of the source modification approval.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

APD

cc: File - Wabash County

U.S. EPA, Region V

Wabash County Health Department

Air Compliance Section Inspector - Ryan Hillman

Compliance Data Section - Karen Nowak

Administrative and Development - Janet Mobley

Technical Support and Modeling - Michele Boner

Part 70 Permit TV169-5650-00004

# **PART 70 MINOR SOURCE MODIFICATION OFFICE OF AIR QUALITY**

**GDX Automotive  
One General Street  
Wabash, IN 46992**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

1 <sup>st</sup> Significant Source Modification: 169-11083-00004, issued on December 3, 1999	
2 <sup>nd</sup> Significant Source Modification: 169-11387-00004, issued on March 13, 2000	
1 <sup>st</sup> Minor Source Modification No.: 169-12230-00004, issued on June 23, 2000	
2 <sup>nd</sup> Minor Source Modification No.: 169-14411-00004	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 14, 2001

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## SECTION A

## SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates stationary various extruded rubber vehicle sealing product manufacturing plant.

Responsible Official: Mike Talaga  
Source Address: One General Street, Wabash, IN 46992  
Mailing Address: P.O. Box 507, Wabash, IN 46992  
Phone Number: 219-569-5255  
SIC Code: 3069  
County Location: Wabash  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Minor Source, under PSD Rules;  
Minor Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) One (1) rubber extrusion, identified as line # 4 consisting of the following:
  - (1) Two (2) extruders, with a combined maximum capacity of 1000 pounds of rubber per hour;
  - (2) One (1) electric molten salt curing oven exhausting to five (5) stacks (L4-1, L4-2, L4-3, L4-4 and L4-5;
- (b) One (1) high volume low pressure (HVLP) surface coating booth, identified as Honda Coating Booth, coating rubber parts at a maximum rate of 94 parts per hour, with particulate emissions controlled by a dry filter system and emissions exhausted through stack H-1;
- (c) One (1) electric IR drying oven, identified as Honda IR oven, with emissions exhausted through stack H-2; and
- (d) Change of identification on the existing permitted Line #3 topcoat spray booth into Line #4 spray booth exhausting to stack L4-6.

### A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## **SECTION B            GENERAL CONSTRUCTION CONDITIONS**

### **B.1      Permit No Defense [IC 13]**

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This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

### **B.2      Definitions [326 IAC 2-7-1]**

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Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

### **B.3      Effective Date of the Permit [IC13-15-5-3]**

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Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

### **B.4      Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]**

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

## **SECTION C                      GENERAL OPERATION CONDITIONS**

### **C.1      Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]**

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- (a)      Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b)      One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c)      A responsible official is defined at 326 IAC 2-7-1(34).

### **C.2      Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]**

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- (a)      If required by specific condition(s) in Section D of this approval, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this approval, including the following information on each facility:
  - (1)      Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2)      A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3)      Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b)      The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c)      PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

### **C.3      Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a)      The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this approval.
- (b)      Any application requesting an amendment or modification of this approval shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**C.4 Opacity [326 IAC 5-1]**

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Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this approval:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

**C.5 Operation of Equipment [326 IAC 2-7-6(6)]**

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Except as otherwise provided in this approval, all air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

**Testing Requirements [326 IAC 2-7-6(1)]**

**C.6 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]**

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- (a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this approval, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the



completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

##### **C.7 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

##### **C.8 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]**

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- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this approval shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this approval is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this approval.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is

documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.9 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]  
[326 IAC 2-6]

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.10 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

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- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;

- (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this approval;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this approval, and whether a deviation from an approval condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance.

C.11 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) The reports required by conditions in Section D of this approval shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this approval, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the

certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (d) The first report shall cover the period commencing on the date of issuance of this approval and ending on the last day of the reporting period.

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) rubber extrusion, identified as line # 4 consisting of the following:
  - (1) Two (2) extruders, with a combined maximum capacity of 1000 pounds of rubber per hour;
  - (2) One (1) electric molten salt curing oven exhausting to five (5) stacks (L4-1, L4-2, L4-3, L4-4 and L4-5;
- (b) One (1) high volume low pressure (HVLP) surface coating booth, identified as Honda Coating Booth, coating rubber parts at a maximum rate of 94 parts per hour, with particulate emissions controlled by a dry filter system and emissions exhausted through stack H-1;
- (c) One (1) electric IR drying oven, identified as Honda IR oven, with emissions exhausted through stack H-2; and
- (d) Change of identification on the existing permitted Line #3 topcoat spray booth into Line #4 spray booth exhausting to stack L4-6.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The VOC potential emissions from the Rubber Extrusion Line # 4 and Honda Coating Booth are each less than 25 tons per year. Therefore, the Best Available Control Technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply. Any change or modification which may increase the Rubber Extrusion Line # 4 VOC potential emissions to 25 tons per year or more and from the Honda Coating Booth to 25 tons per year or more shall obtain OAQ approval before such change may occur.

#### D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

The single HAP and combined HAPs potential emissions from the Rubber Extrusion Line # 4 and the Honda Coating Booth are each less than 10 tons per year and 25 tons per year respectively. Therefore, 326 IAC 2-4.1-1 (New Source Toxics Control) does not apply. Any change or modification which may increase each single HAP or combined HAPs emissions to 10 tons per year or more or 25 tons per year or more from the Rubber Extrusion Line # 4 and the Honda Coating Booth shall obtain OAQ approval before such change may occur.

#### D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the Rubber Extrusion Line # 4 shall not exceed 2.58 pounds per hour when operating at a process weight rate of 1000 pounds per hour. This PM limit shall be determined using the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where: E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour

- (b) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the Honda Coating Booth shall be limited as follows:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where: E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.1.4 Record Keeping Requirements**

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- (a) To document compliance with conditions D.1.1 and D.1.2 in this permit, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly.
- (1) The amount of HAPs and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (2) The VOC and HAPs content of the coatings used;
  - (3) The cleanup solvent usage for each month; and
  - (4) The total VOC and HAPs usage for each month.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.1.5 Reporting Requirements**

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The Permittee is not required to submit reports on these facilities by this permit. However, IDEM may require reporting when necessary to determine if the facility is in compliance. If reporting is required by IDEM, reports shall be submitted in accordance with Section C - General Reporting Requirements.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**Office of Air Quality**  
**COMPLIANCE DATA SECTION**  
  
**PART 70 SOURCE MODIFICATION**  
**CERTIFICATION**

Source Name: GDX Automotive  
Source Address: One General Street, Wabash, IN 46992  
Mailing Address: P.O. Box 507, Wabash, IN 46992  
2<sup>nd</sup> Source Modification No.: 169-14411-00004

**This certification shall be included when submitting monitoring, testing reports/results  
or other documents as required by this approval.**

Please check what document is being certified:

- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**Indiana Department of Environmental Management  
Office of Air Quality**

**Technical Support Document (TSD) for a Part 70 Minor Source  
Modification**

**Source Background and Description**

Source Name:	GDH Automotive		
Source Location:	One General Street, Wabash, Indiana 46992		
County:	Wabash		
SIC Code:	3069		
Operation Permit No.:	T169-5650-00004	Issuance Date:	Pending
Minor Source Modification No.:	169-14411-00004		
Permit Reviewer:	Aida De Guzman		

The Office of Air Quality (OAQ) has an application received on May 24, 2001 from GDH Automotive relating to the construction and operation of the following additional equipment to the source that manufactures various extruded rubber vehicle sealing products:

- (a) One (1) rubber extrusion, identified as line # 4 consisting of the following:
  - (1) Two (2) extruders, with a combined maximum capacity of 1000 pounds of rubber per hour;
  - (2) One (1) electric molten salt curing oven exhausting to five (5) stacks (L4-1, L4-2, L4-3, L4-4 and L4-5;
- (b) One (1) high volume low pressure (HVLP) surface coating booth, identified as Honda Coating Booth, coating rubber parts at a maximum rate of 94 parts per hour, with particulate emissions controlled by a dry filter system and emissions exhausted through stack H-1;
- (c) One (1) electric IR drying oven, identified as Honda IR oven, with emissions exhausted through stack H-2; and
- (d) Change of identification on the existing permitted Line #3 topcoat spray booth into Line #4 spray booth exhausting to stack L4-6.

**Stack Summary**



Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
L4-1	electric molten salt curing oven	33	1	1000	<400
L4-2	electric molten salt curing oven	33	1	1000	<400
L4-3	electric molten salt curing oven	33	1	1000	<400
L4-4	electric molten salt curing oven	33	1	1000	<400
L4-5	electric molten salt curing oven	33	1	1000	<400
Honda Spray Booth	Spray Booth	32	1.5	4830	ambient
IR Oven	Curing Oven	32	0.8	1100	<500

## History

On April 1, 1996, GDX Automotive submitted a Part 70 permit application to the Office of Air Quality, which is still pending for issuance.

## Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Operation Permit (OP 85-06-85-0127), issued on July 27, 1981;
- (b) Exemption, issued on June 18, 1984;
- (c) Registration, issued on July 24, 1984;
- (d) Exemption, issued on February 3, 1986;
- (e) Registration, issued on May 18, 1997;
- (f) Exemption, issued on September 7, 1987;
- (g) Exemption, issued on January 9, 1989;
- (h) Construction Permit (PC (85) 1721), issued on January 9, 1989;
- (i) Registration, issued on August 24, 1989;
- (j) Construction Permit (169-1993-00004), issued on September 6, 1991;
- (k) Construction Permit (169-2825-00004);
- (l) Registration (CP 169-3590-00004), issued on March 28, 1994;
- (m) Exemption (CP 169-3888-00004), issued on August 16, 1994;
- (n) Registration (CP 169-3802-00004), issued on November 4, 1994;
- (o) Construction Permit (169-4072-00004), issued on February 13, 1995;
- (p) Operation Permit (OP 169-0004), issued on February 26, 1996;
- (q) Registration (CP 169-9081-00004), issued on December 18, 1997;
- (r) Operation Permit (OP 169-9774-00004), issued on August 18, 1998;
- (s) Amendment (169-11456-00004), issued on November 4, 1999
- (t) First Significant Source Modification (169-11083-00004), issued on December 3, 1999;
- (u) Second Significant Source Modification (169-11387-00004), issued on March 13, 2000; and
- (v) First Minor Source Modification (169-12230-00004), issued on June 23, 2000.

The source has been determined to be a **major source** in previous permits. Modifications that follows this major source determination were each limited to less than 40 tons of VOC per year as reflected in CP169-2825-0004, CP169-1993-00004 issued on September 6, 1991, CP169-4072-00004 issued on February 13, 1995 and Amendment 169-11456-00004 issued on November 4, 1999.

The draft Part 70 permit TV169-5650-00004 has re-determined the source as being a **minor source**

due to shut down of some emission units and by re-calculating the source wide emissions using the draft AP-42, Chapter 4.12, Rubber Extrusion Emission Factors for compound #8 (EPDM 1 (EPDM Sulfur Cure)).

## Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on May 24, 2001.

## Emission Calculations

### (a) Extrusion Line Using Interpolated Cmpd #8:

#### (1) Curing Oven:

There are no emissions from heating the oven because it is electric, however, emissions are generated from the curing process. Molten salt curing will be used. There are no emission factors in the draft AP-42, Chapter 4.12 about molten salt curing. Therefore, Hot Air Curing emission factor will be used in the calculations.

Emission ID	Pollutant	Maximum Rate (lbs/hr)	Emission Factor (lb/lb rubber)	Uncontrolled Emissions (tons/yr)	Controlled Emissions (tons/yr)
Line 4 Curing Oven	VOC	1,000	$1.90 \times 10^{-3}$	8.3	8.3
	Combined HAPs	1,000	$9.76 \times 10^{-4}$	4.3	4.3

#### (2) Extrusion Process:

VOC emissions from the extrusion process will be calculated using the AP-42, Chapter 4.12.6.

Emission ID	Pollutant	Maximum Rate (lbs/hr)	Emission Factor (lb/lb rubber)	Uncontrolled Emissions (tons/yr)	Controlled Emissions (tons/yr)
Line 4 extruder	VOC	1,000	$3.95 \times 10^{-5}$	0.17	0.17
	PM	1,000	$2.67 \times 10^{-8}$	0.00012	0.00012
	HAPs	1,000	$2.99 \times 10^{-5}$	0.13	0.13

Methodology:

VOC or HAP Emissions = max. rate, lbs/hr \* Ef, lb/lb rubber \* 8760 hrs/yr \* ton/2000 lb

### (b) Honda Surface Coating Booth:

The following calculations determine the coating booth VOC, PM, and PM10 emissions based on a worst case coating density of 7.61 lb/gal, maximum wt% VOC of 78%, volume non-volatile solids content of 17.85%, a maximum production rate of 94 units/hr, 0.001 gal/unit, emissions before controls, and 8760 hours of operation.

$$\text{VOC Emissions} = 7.61 \text{ lb/gal} * 0.78 (\text{wt\% VOC}) * 0.001 \text{ gal/unit} * 94 \text{ unit/hr} * 8760$$

$$\begin{aligned} & \text{hr/yr} * 1/2000 \text{ ton/lb} \\ & = 2.44 \text{ tons VOC/yr} \end{aligned}$$

$$\begin{aligned} \text{PM/PM10 Emissions} &= 94 \text{ units/hr} * 0.001 \text{ gal/unit} * 7.61 \text{ lb/gal} * (1 - 0.78) * (1 - 0.85) * \\ & \quad 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb} \\ &= 0.10 \text{ ton PM/yr} \end{aligned}$$

$$\begin{aligned} [7.61 \text{ lb/gal} * 0.78 \text{ (wt\% VOC)}] / [1 - 0 \text{ (vol.\% water)}] &= 5.94 \text{ lb VOC/gal coat} < \text{water} \\ [7.61 \text{ lb/gal} * 0.78 \text{ (wt\% VOC)}] / [0.1785 \text{ (vol.\% solids)}] &= 33.25 \text{ lb VOC/gal solids} \end{aligned}$$

#### HAPs:

The following calculations determine the HAP emissions based on the maximum hourly emission rates, emissions before controls, and 8760 hours of operation.

lb/hr	tons/yr	HAP
0.01	0.04	Ethylbenzene
0.02	0.09	MIK
0.05	0.22	Xylene
0.44	1.93	Toluene
<b>Total</b>	<b>2.28</b>	

Methodology:

HAP, tons/yr = lb/hr \* 8760 hr/yr \* 1/2000 ton/lb

#### IR Drying Oven:

The IR drying oven is electric and does not generate any emissions.\*

- \* The total potential VOC and HAP fugitive emissions generated by the coatings applied are determined in the surface coating booth calculations.

#### HONDA POTENTIAL EMISSIONS AFTER CONTROLS :

The PM/PM10 emissions from the Honda coating booth are controlled by a dry filter system with a design control efficiency of 80%.

The following calculations determine the PM/PM10 emissions after controls based on the a control efficiency of 80% and the estimated PM/PM10 emissions before controls.

$$\begin{aligned} \text{PM/PM10 after control Emissions} &= 0.10 \text{ tons/yr} * (1 - 0.80) \\ &= 0.02 \end{aligned}$$

#### Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.10012
PM-10	0.10012
SO <sub>2</sub>	0.00

VOC	10.91
CO	0.00
NO <sub>x</sub>	0.00

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Worst Single HAP (Toluene)	2.28
Combined HAPs	4.43

Combined HAPs include 1,1,1-Trichloroethane (Methyl Chloroform); 1,1-Dichloroethane (Vinylidene Chloride); 1,3-Butadiene; MEK (2-Butanone); MIBK (4-Methyl-2-Pentanone); Acetophenone; Aniline; benzene; Biphenyl; bis (2-Ethylhexyl) Phthalate; Carbon Disulfide; Carbonyl Sulfide; Chloromethane (Methyl Chloride); Chromium Compounds; Cumene; Di-n-butylphthalate; Dibenzofuran; Dimethylphthalate; Ethylbenzene; Methylene Chloride; m/p-Xylene; Naphthalene; n-Hexane; Isooctane (2,2,4-Trimethylpentane); Nickel Compounds; O-Xylene; Phenol; Styrene; Tetrachloroethene and Toluene, each in insignificant quantity.

### Justification for the Modification

The source's Part 70 permit (TV169-5650-00004), is still pending for issuance. The Title V permit is being modified through a Minor Source Modification under 326 IAC 2-7-10.5(d), since its potential to emit is less than twenty-five (25) tons per year but greater than ten (10) tons of volatile organic compounds per year.

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the actual emissions table from the Second Significant Modification SSM 169-11387-00004, issued on March 13, 2000, and the proposed Part 70 Permit T169-5056-00004.

Pollutant	Actual Emissions (tons/year)
PM	0.52
PM-10	0.50
SO <sub>2</sub>	0.01
VOC	52.80
CO	0.48
NO <sub>x</sub>	2.40
Single HAP	< 10
TOTAL	> 25

### Source Status

Existing Source PSD Definition (emissions after controls and limited emissions):

Below table reflects the source wide emissions using the draft AP-42, Chapter 4.12.6 Rubber Extrusion for Compound #8 (EPDM 1 (EPDM Sulfur Cure)) emission factors for the extrusion and curing operations. The source was determined to be a **major source** in previous permits. The draft Part 70 permit TV169-5650-00004 has re-determined the source as being a **minor source** based on these emission factors and the removal of some emission units.

Pollutant	Emissions (ton/yr)
PM	3.64
PM10	4.13
SO <sub>2</sub>	0.05

VOC	* 236.8
CO	7.18
NO <sub>x</sub>	8.66
Single HAP	16.05
Combination HAPs	152.87

\* Excluding the VOC emissions from the equipment in this Minor Source Modification.

- (a) This existing source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

### Potential to Emit After Modification

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Extrusion Process	0.00012	0.00012	0.00	0.17	0.00	0.00	0.13
Molten Salt Curing Process	0.00	0.00	0.00	8.3	0.00	0.00	4.3
Honda Spray Booth	0.02	0.02	0.00	2.44	0.00	0.00	2.28
Electric IR Curing Oven	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Emissions	0.02012	0.02012	0.00	10.91	0.00	0.00	6.71

- (a) This modification to an existing minor stationary source is not major because the each pollutant emissions increase is less than the PSD significant levels of 250 tons per year. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

### County Attainment Status

The source is located in Wabash County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	not determined

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Wabash County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub>

emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

- (b) Wabash County has been classified as attainment or unclassifiable for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

#### **Part 70 Permit Conditions**

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

#### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

#### **State Rule Applicability - Entire Source**

- (a) 326 IAC 1-6-3 (Preventive Maintenance Plan)  
The source has submitted a Preventive Maintenance Plan (PMP) on April 1, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).
- (b) 326 IAC 2-6 (Emission Reporting)  
This modification by itself is not subject to 326 IAC 2-6, however the source is subject to 326 IAC 2-6 (Emission Reporting), because it is a Part 70 source that has the potential to emit of more than one hundred (100) tons per year) of volatile organic compounds.
- (c) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
  - (1) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### **State Rule Applicability - Individual Facilities**

- (a) 326 IAC 8-1-6 ( General Reduction Requirements)
  - (1) The proposed Extrusion Line 4 is not subject to 326 IAC 8-1-6, because its potential VOC emissions are less than the applicable level of 25 tons per year.

- (2) The proposed Honda surface coating process is not subject to 326 IAC 8-1-6 because the potential VOC emissions (2.44 tons/yr) are less than the applicable level of 25 tons/yr.
- (b) 326 IAC 8-2 (Surface Coating Volatile Organic Compounds Emission Limitation)  
There are no surface coating rules (326 IAC 8-2) that apply to the proposed Honda Coating Booth because the parts coated are rubber parts. Rubber parts coating operations are not regulated under 326 IAC 8-2. Thus, 326 IAC 8-2 does not apply.
- (c) 326 IAC 2-4.1-1 (New Source Toxics Control)
- (1) The proposed Extrusion Line 4 is not subject to 326 IAC 2-4-1.1, because its potential to emit for single HAP is less than 10 tons per year and the combined HAPs potential to emit is less than 25 tons per year.
- (2) The proposed Honda Spray operation is not subject to 326 IAC 2-4-1.1, because its potential to emit for single HAP is less than 10 tons per year and the combined HAPs potential to emit is less than 25 tons per year.
- (d) 326 IAC 6-3-2 (Process Operations)
- (1) 326 IAC 6-3-2 (Process Operations) mandates a particulate matter (PM) limit of 2.58 pounds per hour from the proposed Extrusion Line #4. This PM limit shall be determined using the following:
- Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:
- $$\begin{aligned} E &= 4.10 P^{0.67} \\ &= 4.10 (0.5)^{0.67} \\ &= 2.57 \text{ lbs/hr, the source is in compliance with this limit because its} \\ &\quad \text{potential PM emissions do not exceed the allowable} \end{aligned}$$
- where: E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour  
= 1000 lb/hr /2000 lbs/hr  
= 0.5 ton/hr
- (2) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the Honda Coating Booth shall be limited as follows.
- Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:
- $$E = 4.10 P^{0.67} \text{ where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$
- (e) 326 IAC 6-2 (Particulate Matter Emissions Limit From Indirect Heating Facilities)
- (1) The Molten Salt Curing Oven is not subject to 326 IAC 6-2, because it is not a source of indirect heating, and it is electric and therefore does not emit PM.
- (2) The IR curing oven for the Honda spray booth is not subject to 326 IAC 6-2, because it is not a source of indirect heating, and it is electric and therefore does not emit PM.

## Testing Requirements

Pursuant to the construction permit stack testing guidance "Stack Testing Requirements in Construction Permits", issued on January 1, 1999, stack testing is required if:

- (a) any unit is subject to a NSPS or NESHAP standard,
- (b) any unit is subject to 326 IAC 6-1,
- (c) the unrestricted potential emissions of any unit are greater than 40 tons/yr,
- (d) the modification consists of any unit which utilizes an emission control device to satisfy a synthetic minor limit,
- (e) the modification consists of any units which use unapproved emission factors to estimate the emissions, and
- (f) any unit of the proposed modification is not in compliance with the applicable state and federal rules.

There are no NSPS or NESHAPs that apply to the proposed modification, 326 IAC 6-1 does not apply, the unrestricted potential emissions are less than the applicable level of 40 tons/yr, there are no emission units that utilize a control device to reduce the emissions to satisfy a synthetic minor limit, there are no unapproved emission factors used, and the source is in compliance with all applicable state and federal rules.

Thus, no stack testing for the proposed modification is required.

### **Compliance Monitoring:**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

Although the source Title V permit has not been issued, the source is considered subject to the Part 70 requirements under a permit shield. Thus, a determination has to be made as to whether or not compliance monitoring is required of the proposed modification.

Pursuant to the compliance monitoring guide "Title V Air Permit Compliance Monitoring Facts", issued on May 14, 1996, compliance monitoring is required if the proposed modification consists of units that emit particulate matter (PM), sulfur dioxide (SO<sub>2</sub>), and/or volatile organic compounds (VOC), and if the modification consists of any unit that:

- (a) is subject to a NSPS or NESHAP standard, or
- (b) has a control device and the allowable emissions of the controlled pollutant exceeds 10 pounds per hour, or
- (c) does not utilize emission controls and has actual emissions exceeding 25 tons/yr, or
- (d) would have been subject to an applicable requirement but for conditions limiting its potential to emit.



There are no NSPS or NESHAPs that apply to the proposed modification, the allowable controlled PM emissions are less than the applicable level of 10 lb/hr, the unrestricted VOC potential (10.91 tons/yr) let alone actual emissions are less than the applicable level of 25 tons/yr, and there are no units for which potential to emit is limited such that an applicable requirement becomes not applicable. Thus, no compliance monitoring for the proposed modification is required.

## **Conclusion**

The construction and operation of this proposed Rubber Extrusion Line #4 shall be subject to the conditions of the attached **2<sup>nd</sup> Minor Source Modification 169-14411-00004**.